

60-day Notice of Violation

A notice of violation which is the subject of the action per
California Health & Safety Code §25249.7(d),
and in compliance therewith

To:

Proposition 65 Private Enforcement Matter
California Attorney General's Office:
PO Box 70550
Oakland CA 94612-0550

District Attorney's Office for 58 Counties

City Attorneys for San Francisco, San Diego, San Jose, Los Angeles

Ikea:

CEO Ms. Pernille Lopez, Ikea Group President Anders Dahlvig
Ikea Group, Ikea California, LLC., Ikea Property, Inc., Ikea U.S. West, Inc., Ikea U.S., Inc., Ikea
U.S. General Partners, Inc., Ikea North America, Ikea Wholesale, Inc.

Sept 27, 2007

Hello. The following relates to a Prop. 65 private enforcement matter. This law firm, (The Schinner Law Group) represents Jennie Bakondi, and her daughter, "M", an 11-month old infant, and Mandy Leigh, and her daughter, "G", a 1-year old infant, all citizens of the State of California, (all of whom together hereafter may be referred to as "Schinner Law Group"). The above parties, represented by Daniel Bakondi, Esq., of The Schinner Law Group, hereby give you notice as follows: That Ikea Group, Ikea California LLC., Ikea Property Inc., Ikea U.S. West Inc., Ikea U.S. Inc., Ikea U.S. General Partners Inc., Ikea North America, Ikea Wholesale Inc. and/or other businesses essentially the same or part of the same furniture retail entity (hereafter may be referred to as "Ikea") have been, are, and threaten to be, in violation of Cal. Health & Safety Code §25249.6 et seq through their eight Ikea furniture stores located in California. This office and the parties whom we represent are private enforcers of Proposition 65 acting in the public interest, and may be reached with the address and phone number below, through myself, Daniel Bakondi, Esq., an attorney in the Schinner Law Group, and a "responsible individual."

The above-referenced violations, as examples only, occur when Ikea allegedly commits the following acts and exposes men, women, and children to the following harmful chemicals and hazardous substances (which hereafter may be referred to as "listed chemicals"): #1) Sells home lighting lamps such as the lamp model named "Storm" and "Alang" with an electrical cord, which contains and exposes men, women and children to lead and/or arsenic. As an example only, product 16441, AA119853-3, 85-0261-07 and as an example only, product 16441, AA-49317-3, 50029162 respectively. #2) Sells a lamp dimmer switch named "Dimma" with an electrical cord, which contains and exposes men, women and children to lead and/or arsenic, As an example only, product 16670, 90-6317-3, AA141492-3. #3) Maintains on each of its stores' premises bins for disposal of hazardous substances called "recycle" bins for the disposing of light bulbs and broken light bulbs which contain harmful substances such as mercury, which may escape

light bulbs especially broken bulbs, with the top of the disposal container open, and thus men, women, and children nearby may be exposed including through dust and particles and harmful substances which may emanate. #4) Maintains on each of its stores' premises a bin for disposal of hazardous substances called "recycle" bin for the disposing of batteries including failed or leaked or broken batteries which contain harmful substances such as mercury, cadmium, and/or Nickel, with the top of the disposal container open, and thus men, women, and children nearby may be exposed including through dust and particles and harmful substances which may emanate. Also, children and unaware persons may put their hands inside such bins and be exposed. These and similar exposures are being done by Ikea without the clear and reasonable warning required by Proposition 65.

Though specific products or exposures are listed, this notice pertains to all variations of the type of products or exposures of which the named product or exposure is an example. Thus, this notice pertains to all electrical cords sold by Ikea containing listed hazardous substances, whether or not part of a lamp, dimmer cord, extension cord, or other common household electrical appliance. This notice also pertains to exposures resulting from all bins for disposal of hazardous substances being maintained on Ikea store premises where potential and actual customers, including children, are present. The above described exposures occur in the eight Ikea stores located in California, as well as beyond the property owned or controlled by the alleged violators, including anywhere such products may be found, including in the homes of Ikea customers, and homes of those persons owning Ikea products, whether purchased or received as a gift. This notice does not apply to the conduct of manufacturers occurring outside the State of California.

Those persons exposed may be all potential and actual consumers, and potentially all those who may come into contact with described Ikea products, or may come near hazardous substances maintained in disposal bins on Ikea store premises. All exposures alleged are occurring within the State of California. Hazardous substances to which this notice relates include arsenic, arsenic (inorganic oxides), arsenic (inorganic arsenic compounds), lead and lead compounds, mercury, lithium, nickel, nickel (metallic), nickel compounds, nickel hydroxide, nickel subsulfide, and cadmium and cadmium compounds, and potentially others.

Exposures like #3 and #4 occur in counties in the State of California where Ikea stores reside, and product exposures like those we allege in #1 and #2 occur in every county of the State of California. All these alleged exposure to these harmful substances can occur by physical contact including dermal contact, and ingestion. Additionally, exposure to harmful substances in exposures #3 and #4 may also occur through inhalation. Though anyone can be exposed, children, infants, and babies are especially vulnerable to exposure to the substances listed above, especially lead and arsenic, and such exposure can cause severe and permanent, devastating harm. Anyone touching a cord containing listed chemicals may be exposed as alleged in #1 and #2 above. People often reach for light/dimmer switches and do not wash their hands after, unaware of any possible harm. Children, infants, and babies are especially vulnerable to harmful substances on electrical cords and lamp cords, because they are by nature attracted to cords around the house and want to touch them and hold them, pull them and put them in their mouths as part of their natural infant curiosity. This is occurring, and parents are unaware that these electrical cords even contain harmful substances.

Occupational exposures may include Ikea employees, salespersons, cleaning, maintenance and other staff, and agents, and independent contractors who may also be harmed by the same exposures above when packing, unpacking, arranging, displaying, or otherwise working with or near these alleged routes of exposure. They may handle products, or come in contact with disposed-of hazardous materials, or work with or near the routes of exposures described. This notice alleges the violation of Proposition 65 with respect to occupational exposures governed by the California State Plan for Occupational Safety and

Health. The State Plan incorporates the provisions of Proposition 65, as approved by Federal OSHA on June 6, 1997. This approval specifically placed certain conditions with regard to occupational exposures on Proposition 65, including that it does not apply to the conduct of manufacturers occurring outside the State of California. The approval also provides that an employer may use the means of compliance in the general hazard communication requirements to comply with Proposition 65. It also requires that supplemental enforcement is subject to the supervision of the California Occupational Safety and Health Administration. Accordingly, any settlement, civil complaint, or substantive court orders in this matter must be submitted to the Attorney General.

These violations have occurred every day since at least, May of 2005. The violations alleged in this notice will continue every day until reasonable warnings are given to those people exposed or until Ikea stops selling products containing lead and arsenic, and stops maintaining on its store premises waste disposal bins for mercury and other harmful substances, without the proper warning required by law.

Please direct all communications regarding this matter to me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Daniel Bakondi', with a large, stylized loop at the end.

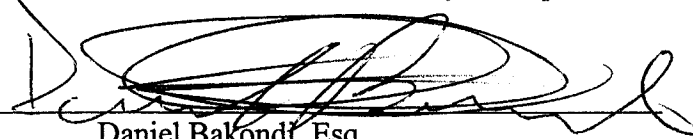
Daniel Bakondi, Esq.
The Schinner Law Group
96 Jessie Street San Francisco CA 94105
(415) 369 – 9050 phone, (415) 369 – 9053 fax

CERTIFICATE OF MERIT Health and Safety Code 25249.7(d)

I, Daniel Bakondi, Esq., hereby declare:

1. This Certificate of Merit accompanies the attached sixty-day notice(s) in which it is alleged that the parties identified in the notice have violated Health and Safety Code Section 25249.6 by failing to provide clear and reasonable warnings.
2. I am attorney for the noticing party.
3. I have consulted with one or more persons with relevant and appropriate experience or expertise who has reviewed facts, studies, or other data regarding the exposure to the listed chemical(s) that is the subject of this action.
4. Based on the information obtained through those consultations, and all other information in my possession, I believe there is a reasonable and meritorious case for private action. I understand that "reasonable and meritorious case for private action" means that the information provides a credible basis that all elements of the plaintiffs' case can be established and the information did not prove that the alleged violator will be able to establish any of the affirmative defenses set forth in the statute.
5. The copy of this Certificate of Merit served on the Attorney General has attached to it factual information sufficient to establish the basis for this Certificate, including the information identified in Health and Safety Code section 25249.7(h)(2), ie: the identity of the persons consulted with and relied on by the certifier, and 2) the facts, studies, or other data reviewed by those persons.

Dated: Sept 27, 2007



Daniel Bakondi, Esq.
The Schinner Law Group
96 Jessie Street San Francisco CA 94105
(415) 369 – 9050 phone, (415) 369 – 9053 fax

Certificate of Service

I, JEANNIE LIEN, the undersigned, declare under penalty of perjury:

I am a citizen of the United States, over the age of 18 years, and not a party to the within action; my business address is 96 Jessie Street, San Francisco CA 94105. On September 27, 2007, I served the following documents:

- 60-day Notice of Violation
- Certificate of Merit
- Certificate of Merit Attachments (Served only on the Attorney General)
- Proposition 65: A summary

Served on the violators listed below by placing each envelope in a United States Postal Service Mailbox, first class postage prepaid. The parties listed below, as well as those on the attached Service List were served via first class mail.

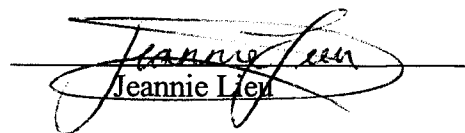
CEO Pernille Lopez Ikea California LLC., Ikea Property Inc., Ikea U.S. West Inc., Ikea U.S. Inc., Ikea U.S. General Partners Inc., Ikea North America, Ikea Wholesale Inc., 496 W. Germantown Pike Plymouth Meeting PA 19462 (610)834-0180	CEO Pernille Lopez Ikea California LLC., Ikea Property Inc., Ikea U.S. West Inc., Ikea U.S. Inc., Ikea U.S. General Partners Inc., Ikea North America, Ikea Wholesale Inc., 420 Alanwood Rd. Conshocken PA 19428	Ikea Group President Anders Dahlgvig Ikea California LLC., Ikea Property Inc., Ikea U.S. West Inc., Ikea U.S. Inc., Ikea U.S. General Partners Inc., Ikea North America, Ikea Wholesale Inc., 496 W. Germantown Pike Plymouth PA 19462	CEO Pernille Lopez Ikea California LLC., Ikea Property Inc., Ikea U.S. West Inc., Ikea U.S. Inc., Ikea U.S. General Partners Inc., Ikea North America, Ikea Wholesale Inc., 1429 Flatrock Rd. Narberth PA 19072, and also
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As well as providing copies of the notice to the public enforcers by placing a true and correct copy in a sealed envelope, addressed to each party listed below, and served as follows:

Via overnight mail service by placing such envelopes in a Federal Express Drop-Off Box	The Attorney General of the State of California, Proposition 65 Private Enforcement Matter Hazard Communication Standard/Proposition 65 Supplemental Enforcement Matter
	The Attorney General of the State of California, Attorney General Copy: Contains Official Information Pursuant to Evidence Code Section 1040 Hazard Communication Standard/Proposition 65 Supplemental Enforcement Matter
By placing each envelope in a United States Postal Service Mailbox, first class postage prepaid	The District Attorney for each of 58 counties in California; and the City Attorney for Los Angeles, San Diego, San Jose, San Francisco, and Sacramento Proposition 65 Private Enforcement Matter Hazard Communication Standard/Proposition 65 Supplemental Enforcement Matter

A list of addresses for each of these recipients in the box above is attached.

Executed on September 27, 2007


Jeannie Lien